

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, FEDERAL HIGHWAY
ADMINISTRATION, SHAILEN BHATT, in his
official capacity as Administrator of the Federal
Highway Administration, and RICHARD J.
MARQUIS, in his official capacity as Division
Administrator of the New York Division of the
Federal Highway Administration,

Defendants,

and

THE METROPOLITAN TRANSPORTATION
AUTHORITY and THE TRIBOROUGH
BRIDGE AND TUNNEL AUTHORITY,

Intervenor-Defendants.

Hon. Leo M. Gordon

No. 2:23-cv-03885-LMG-LDW

**NOTICE OF MOTION FOR
LEAVE TO WITHDRAW *PRO*
HAC VICE APPEARANCES**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on January 6, 2025, or as soon thereafter as counsel may be heard, Sive, Paget & Risel P.C., the attorneys for Intervenor-Defendants, Metropolitan Transportation Authority and Triborough Bridge and Tunnel Authority (collectively, “Intervenor-Defendants”) shall move, pursuant to Local Civil Rule 101.1(c)(5), before the Honorable Leo M. Gordon of the United States District Court, District of New Jersey, for leave to withdraw the *pro hac vice* appearances of Gabrielle E. Tenzer, Joshua A. Matz, and Kate Harris as counsel for Intervenor-Defendants in the above captioned case.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4) no brief in support of this motion is necessary because (1) Intervenor-Defendants will continue to be represented by the remaining counsel of record from Sive, Paget & Riesel P.C. and Kaplan Martin LLP, and (2) the withdrawals do not relate to any procedural or substantive legal issues raised in this matter.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is respectfully submitted herewith.

Dated: December 4, 2024

Respectfully submitted,

/s/ Daniel Chorost

Daniel Chorost

SIVE, PAGET & RIESEL P.C.

560 Lexington Avenue, 15th Floor

New York, NY 10022

(212) 421-2150

dchorost@sprlaw.com

*Counsel for Intervenor-Defendants
Metropolitan Transportation Authority and
Triborough Bridge and Tunnel Authority*